

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Rockford Paperboard - Removal Polrep  
Initial Removal Polrep

US EPA RECORDS CENTER REGION 5



426023



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #1  
Initial  
Rockford Paperboard  
C550  
Rockford, MI  
Latitude: 43.1030374 Longitude: -85.5781170

**To:** Valencia Darby, Department of Interior  
Andrew Raddant, Department of Interior  
Bruce VanOtteren, MDEQ  
Joe Walczak, MDEQ  
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Sherry Fielding, U.S. EPA  
Charlie Gebien, U.S. EPA  
John Glover, U.S. EPA  
Jon Gulch, U.S. EPA  
John Martote, U.S. EPA  
Carol Ropski, U.S. EPA  
USCG PolRep Distribution, USCG  
Jeffrey Kimble, U.S. EPA  
Steven Kaiser, EPA  
Kashalya Khanna, EPA  
Nancy Johnson, MDEQ  
Mindy Clement, EPA

**From:** Jeffrey Kimble / Elizabeth Nightingale, OSC  
**Date:** 1/30/2012  
**Reporting Period:** Week of January 23, 2012

## **1. Introduction**

### **1.1 Background**

<b>Site Number:</b>	C550	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	1/23/2012	<b>Start Date:</b>	1/23/2012
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	MIN000510634	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### **1.1.1 Incident Category**

EPA has initiated a time critical removal action at the site to remove numerous containers of characteristically hazardous flammable, corrosive and other wastes. Container sizes range from 5-gallons pails to 1,000-gallon

#### **1.1.2 Site Description**

The site is comprised of a vacant paper mill building with ancillary equipment, parking areas, lawn areas and areas adjacent to the Rogue River. The site occupies an approximate area of 17.58 acres in an industrial setting, bordered by Childsdales Avenue to the northwest, a wooded area to the northeast, and the Rogue River to the southeast and southwest. The site operated as paperboard/carton box production facility from 1940 until 2001. The site is now abandoned.

##### **1.1.2.1 Location**

The Rockford Paperboard Site (Site) is located at 7700 (aka 7734) Childsdales Avenue in the City of Rockford, Michigan, 49341. Coordinates for the site are 43.102421 degrees latitude and -85.577036 degrees longitude.

##### **1.1.2.2 Description of Threat**

The presence of hazardous substances at the site has been documented through EPA field screening and laboratory analysis. The site evaluation documented 30 small containers, 1 cylinder, 1 tote of solvent, 3 pallets of CR-8C Titanium Dioxide (Manufactured by Kerr McGee), 1 pallet Polyvinyl Alcohol, 1 tote containing a mix of Cyclohexylamine [108-91-8] and NN Diethyltoluylamine [100-37-8], 73 drums of unknown materials, 2 1,000-gallon tanks of unknown wastes, 10 300-gallon totes of unknown wastes, 7 bags of Polyethylene glycol 3350 granule, large totes of liquid waste. There is also a chemical laboratory. Further inspection revealed additional container waste, including a large tank containing caustic material, and a polymer spill to the ground inside and outside the facility.

The site building is in various states of disrepair. Holes in the roof and walls of the building allow precipitation to enter. This precipitation will lead to the further degradation of site containers and contribute to the likelihood of release. Similarly, gas service has been cut-off to the building and no heat is available. Freezing of the chemicals on the site can lead to expansion and bulging of the containers and increase the likelihood of release. Lastly, the building currently sits vacant and perimeter fencing is incomplete, which can lead to trespassers. Trespassers have the

potential to cause an accidental or purposeful release to the environment. The Rogue River lies less than 100 feet from the rear of the building.

The conditions remaining at the site present substantial threat to the public health, or welfare, and the environment and meet the criteria for a time-critical removal action as provided for in the NCP, 40 C.F.R. §300.415(b)(2)

### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

EPA assessment results showed that the wastes in drums, vats, totes, tanks, compressed gas cylinders, and miscellaneous containers is hazardous. Several drum samples had a pH greater than 12.5 SUs, one drum sample was so acidic an accurate measurement was not able to be obtained, and lab-grade acids were also found to be present. Numerous drums showed labeling or indicated via field instrumentation that they hold volatile organic compounds. Two drum samples met the criteria to be considered ignitable waste (D001).

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

EPA clean up operations will consist of properly identifying, repackaging, and shipping off site the hazardous wastes and contaminants from the site. EPA actions are focused on the containerized wastes at the site. However, several areas of the facility floor have now been documented to have removable contamination present on the floor surface. These areas will also be properly addressed to prevent exposure to pedestrian traffic and to prevent tracking of waste off site.

#### **2.1.2 Response Actions to Date**

EPA and its contractors (START and ERRS) mobilized to the site on Monday, January 23, 2012, to initiate the critical removal actions. After a site walk through of the facility, the crew began sweeping the building for waste containers and moving them to a staging area. The staging area was set up in the warehouse room of the facility which has a loading dock. A representative from Bridgeway Church, the entity who will be assuming ownership of the property after EPA completes its actions, was on site to talk with OSC Kimble. Nancy Johnson with MDEQ also stopped by the site to see the set up and talk to OSC Kimble.

On Tuesday January 24, 2012, the crew continued sweeping the building and moving containers to the staging area. A forklift was delivered to the site to assist with moving the larger totes that were too heavy for the skid-steer loader. Air monitoring was conducted in the work zones for O<sub>2</sub>, LEL, H<sub>2</sub>S, CO and VOC. Air monitoring will be conducted daily and a record will be kept in the site file of the readings.

On Wednesday January 25, 2012, the crew continued sweeping the building and moving containers to the staging area. Two roll off boxes were delivered to site for the solid waste that needs to be removed from the site. The crew began cutting an access hole into a storage tank that was used for caustic material. The material, which had ~14 SU, appeared to be approximately three feet thick in the tank with the top 20% being liquid and the rest a sludge. This material will be removed and properly containerized for off site disposal.

On Thursday January 26, 2012, the crew continued sweeping the building and moving containers to the staging area. The crew completed cutting an access hole into the caustic tank, initiated cutting of RCRA empty plastic drum totes for disposal, began crushing empty drums and started scraping polymer from a spill area inside the building. START initiated a drum inventory log of the assembled containers.

On Friday, January 27, 2012, the crew completed sweeping the building and moving containers to the staging area. The crew continued cutting of RCRA empty plastic drums, crushing empty metal drums and scraping polymer from a spill area inside the building. The on site electric generator was serviced. The assembled 55-gallon drums were opened and screened in level B PPE by OSCs Kimble and Nightingale and the crew. Readings from two drums indicated that there were enough VOCs present that the drums should be sampled in level B PPE. Samples for

hazard categorization (Hazcatting) were collected from these two drums. The remainder of the containers will have samples in Level C PPE based on the air monitoring results from each container. The crew began cutting a 3 gallon poly tank that had residual sludge in it. The contaminated tank will be disposed of, and the sludge will be containerized for off site disposal as well. OSCs Kimble and Nightingale also delivered Site Emergency Contingency Plans to the Plainfield Township Fire Department, the Kent County Sheriffs Office, and the hospital.

On Saturday, January 28, 2012, the crew completed cutting apart the 3,000-gallon poly tank. START continued collecting drum information and filling out drum logs. The crew initiated sampling of the remaining drums for hazcatting samples.

### 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Rockford Paperboard (former Converters Paperboard)

EPA is conducting a fund lead cleanup because they do not believe that Rockford Paperboard has assets available to conduct the cleanup on a time critical schedule.

The Bridgeway Community Church has expressed interest in receiving the property after EPA completes the cleanup. The Church is planning a phase 2 assessment of the property, and has plans to demolish approximately 80% of the facility structure. The remaining building will be re-habbed into their new church home. Bridgeway Community Church has no previous liability at the site and is not a PRP. The Church also submitted a grant application to MDEQ but the grant was stopped in its final stage and the church will not receive MDEQ grant assistance for demolition activities. If the Church completes this second phase of the project, additional environmental benefits will be achieved.

### 2.1.4 Progress Metrics

<i><b>Waste Stream</b></i>	<i><b>Medium</b></i>	<i><b>Quantity</b></i>	<i><b>Manifest #</b></i>	<i><b>Treatment</b></i>	<i><b>Disposal</b></i>

<b>R5 Priorities Summary</b>		
This is an Integrated River Assessment. The numbers should overlap.	Miles of river systems cleaned and/or restored	1
	Cubic yards of contaminated sediments removed and/or capped	
	Gallons of oil/water recovered	
	Acres of soil/sediment cleaned up in floodplains and riverbanks	
Stand Alone Assessment	Acres Protected	17
	Number of contaminated residential yards cleaned up	0
	Human Health Exposures Avoided	357 (1/16th City pop size)

	Number of workers on site	8
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## **2.2 Planning Section**

### **2.2.1 Anticipated Activities**

EPA will continue site work until waste disposal is complete .

#### **2.2.1.1 Planned Response Activities**

- Sample staged containers
- Decontaminate facility floors as required
- Hazcat waste samples
- Submitt disposal samples to laboratory
- Profile wastestreams
- Recontainerize/repackage waste for off site disposal
- Demobilize from site

#### **2.2.1.2 Next Steps**

For the week of January 30, 2012, EPA will continue samplinf activities and begin Hazcatting on site wastes

### **2.2.2 Issues**

None. Site work is proceeding according to the SOW in the Action Memo.

## **2.3 Logistics Section**

EPA is operating out of on site trailers. Temporary electric is being provided through a generator. Security is o for all non work hours and will remain for the duration of the project

## **2.4 Finance Section**

### **2.4.1 Narrative**

ERRS has been funded to \$100,000 As of January 30, 2012, 50% of this budget has been expended The C anticipates that an additional \$75,000 to \$125,000 will be needed to complete the project.

EPA is managing the technical consulting costs by having only 1 START person on site EPA Environmental Scientist Keith Lesniak is on site to provide additional contractor oversight, and to conduct air monitoring to all START to focus on the more technical logging and tracking work.

## **2.5 Other Command Staff**

### **2.5.1 Safety Officer**

OSC Jeff Kimble is the lead for EPA

Bill Poma is the RM and lead H&S person for the ERRS contractor. Mr Poma leads the daily safety briefings .  
beggining of each daily shift.

### **2.5.2 Liaison Officer**

If needed, OSC will perform these tasks.

### **2.5.3 Information Officer**

If needed, OSC will perform these tasks.

### **3. Participating Entities**

#### **3.1 Unified Command**

None This is a fund lead removal action. There is no Unified Command. The OSC is in charge of this cleanup

#### **3.2 Cooperating Agencies**

MDEQ Nancy Johnson is the contact for the State of Michigan. MDEQ may oversee the Phase 2 activities conduct a consultant for Bridgeway Community Church

### **4. Personnel On Site**

EPA:

- OSC Jeff Kimble
- OSC Elizabeth Nightingale
- Environmental Scientist Keith Lesniak

ERRS:

- RM Bill Poma
- Formean Gary Butcher
- 2 Field Techs
- FCA Khris Beck
- 1 Chemist (part time)

START:

- Caitlin Ruza

### **5. Definition of Terms**

SU = Standard units  
ERRS = Emergency and Rapid Response Services (contract)  
RM = Response manager  
START = Superfund Technical Assessment and Response Team (contract)  
MDEQ = Michigan Department of Environmental Quality  
OSC = On Scene Coordinator  
Hazcat = process of determining the hazard category of wastes on site, includes field testing of material  
PRP = Potentially responsible party  
PPE = personal protection equipment  
RCRA = Resource Conservation and Recovery Act  
LEL = lower explosive limit  
O2 = oxygen  
H2S = hydrogen sulfide  
CO = carbon monoxide  
VOC = volatile organic compounds

### **6. Additional sources of information**

NONE

#### **6.2 Reporting Schedule**

Weekly or as determined by OSC.

**7. Situational Reference Materials**

NONE.